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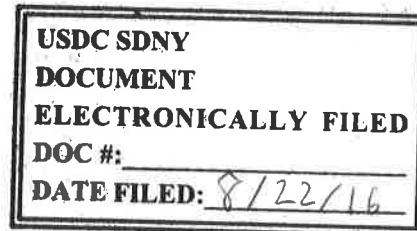
MEMO ENDORSED

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August 22, 2016

VIA ECF

The Honorable Paul A. Engelmayer  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 2201  
New York, NY 10007



Re: **Amendment to Proposed Joint Pre-Trial Order**  
*Tatyana Ruzhinskaya, et al. v. HealthPort Technologies, LLC*  
Civil Action File No. 1:14-cv-02921-PAE

Dear Judge Engelmayer:

Pursuant to this Court's August 8, 2016 order granting HealthPort Technologies, LLC ("Defendant" or "HealthPort") until August 22, 2016 to identify by name two of its corporate witnesses, HealthPort hereby amends section 7.B. of the Proposed Joint Pre-Trial Order as follows:

- Defendant's witness number 5, previously identified as a CIOX Financial Corporate Representative, shall be Tony Farley, Senior Vice President, Operations.
- Defendant's witness number 7, previously identified as a CIOX Corporate Representative from Beth Israel, shall be Tony Farley, Senior Vice President, Operations.

Additionally, HealthPort respectfully requests to amend sections 1.B. and 9 of the Proposed Joint Pre-Trial Order as follows:

169335.1



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**1. Parties and Counsel**  
**B. Defendant**

Defendant HealthPort Technologies, LLC ("Defendant" or "HealthPort") is represented by:

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**9. Exhibits**

**A. Plaintiff's Exhibit List**

- HealthPort removes its double asterisks designation under the column reading "no objection on any ground" for Plaintiff's Exhibit 13.

THOMPSON  
HINE

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**B. Defendant's Exhibit List**

- HealthPort removes from its list Exhibit 234, which is the same document as Plaintiff's Exhibit number 13.

Plaintiff has consented to the amendments to sections 1.B and 9 of the Proposed Joint Pre-Trial Order.

Respectfully submitted,

**THOMPSON HINE LLP**

/s/ Seth A. Litman

Seth A. Litman

SAL/tlg

cc: All Counsel of Record via ECF

Granted. The Court will recognize the above amendments as effective.

**SO ORDERED:**

8/22/16

Paul A. Engelmayer  
HON. PAUL A. ENGELMAYER  
UNITED STATES DISTRICT JUDGE